

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

V.

DANIEL DELVALLE, et al.,

Defendants.

No. 12-cr-732 (WHP)

NOTICE OF MOTIONS

PLEASE TAKE NOTICE that Defendant Daniel Delvalle, upon the accompanying Memorandum of Law, and upon the public record and all prior papers and proceedings herein, hereby moves this Court before the Honorable William H. Pauley III, United States District Judge, United States District Court for the Southern District of New York, at the Courthouse located at 500 Pearl Street, New York, New York, on Motions *in Limine* for an order to exclude any and all evidence of uncharged crimes related to the killing of Kenya Miller, pursuant to Federal Rule of Evidence 403, and an order requiring the Government to disclose all Brady / Giglio material and 18 U.S.C. § 3500 material no later than December 14, 2013.

Mr. Delvalle also joins any and all motions brought by his co-defendants that are applicable to him. He further reserves his right to bring additional applications in reply to the Government's response to his Motions *in Limine* and any additional motions that he joins. Finally, Mr. Delvalle reserves his right to supplement his Motions *in Limine* and to bring additional motions as deemed necessary.

Mr. Delvalle requests an order granting the relief sought herein, and for such other relief as this Court may deem just and proper. A Memorandum of Law in Support of Mr. Delvalle's Motions *in Limine* is submitted herewith.

Dated: November 1, 2013
New York, New York

Respectfully submitted,

/s/ Lance Croffoot-Suede
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